App. No. 09/940,141
Amendment A
Page 10

R E M A R K S

Reconsideration of the present application in view of the amendments and following remarks is respectfully requested. Claims 10 and 21 have been canceled. Claims 1, 11, 13 and 22 have been amended. Twenty-one claims are pending in the application: Claims 1-9, 11-20, and 22-23.

35 U.S.C. ' 102

1. Claims 1-5, 8-16, and 19-23 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Publication No. 2002/0178361 (*Genty et al.*).

M.P.E.P Section 2131 states that "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."

Genty et al. disclose a Virtual Private Network (VPN) that includes a system and method for dynamically determining a Certificate Revocation List (CRL) location and protocol. Figure 1 of *Genty et al.* shows one computer system 100 communicating with various VPNs by establishing multiple tunnels, one corresponding to each VPN (See *Genty et al.* paragraph 0039). Figure 2 of *Genty et al.* also shows one computer system 200 using multiple tunnels to securely transmit data to and from other computer systems using VPN configuration data and certificate data (See *Genty et al.* paragraph 0040).

In contrast, amended claim 1 recites in part "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system,

App. No. 09/940,141
Amendment A
Page 11

where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said new server-side system, where said VPN tunnel is established over said modem." Therefore, Applicants amended claim 1 recites establishing two VPN tunnels through the same modem. The first VPN tunnel established through the modem is between a first client computer and a first server-side system and the second VPN established through the same modem is between a different client computer having a new network address and a new server-side system.

While multiple VPN tunnels are established in *Genty et al.* they are from a single computer (100, 200) to other computer systems. There is no teaching or suggestion of "establishing a VPN tunnel between said at least one client computer having said network address and said server-side system, where said VPN tunnel is established over said modem" and "establishing a new VPN tunnel between said different client computer having said new network address and said new server-side system, where said VPN tunnel is established over said modem," such as is claimed by Applicants. As described in detail in Applicants specification, security of the multiple VPNs is not compromised because each VPN is only established, for example, between the client computer where login occurred and the VPN associated with a user's unique login details. This is accomplished, for example, restricting communication of each VPN to a single client computer having a previously established and stored IP or MAC address. *Genty et al.* does not teach or suggest any means for solving the problem of establishing two different VPN connections from two different client computers to two different server-side systems using the same modem.

Therefore, *Genty et al.* does not teach each and every

App. No. 09/940,141
Amendment A
Page 12

element as set forth in claim 1 as required by M.P.E.P. section
2131. Thus, Applicant respectfully submits that claim 1 is not
anticipated by *Genty et al.* Furthermore, claims 2-9 and 12 are
also not anticipated by *Genty et al.* at least because of their
dependency upon claim 1.

Applicants have amended claim 11 such that claim 11 is
in independent form. Claim 11 recites in part "establishing a
VPN tunnel between said at least one client computer having said
network address and said server-side system, where said VPN tunnel
is established over said modem" and "establishing a new VPN tunnel
between said different client computer having said new network
address and said server-side system, where said VPN tunnel is
established over said modem."

As stated above, Figures 1 and 2 of *Genty et al.* teach a
single computer system that uses multiple tunnels to communicate
with multiple VPNs. However, *Genty et al.* does not teach or
suggest establishing two different VPN connections from two
different client computers using the same modem to a single server-
side system. As described in detail in Applicants specification,
security of the multiple VPNs is not compromised because each VPN
is only established, for example, between the client computer where
login occurred and the VPN associated with a user's unique login
details. This is accomplished, for example, restricting
communication of each VPN to a single client computer having a
previously established and stored IP or MAC address. *Genty et al.*
does not teach or suggest any means for solving the problem of
establishing two different VPN connections from two different
client computers using the same modem to a single server-side
system. Thus, *Gentry et al.* does not teach or suggest
"establishing a VPN tunnel between said at least one client

App. No. 09/940,141
Amendment A
Page 13

computer having said network address and said server-side system,
where said VPN tunnel is established over said modem" and
"establishing a new VPN tunnel between said different client
computer having said new network address and said server-side
system, where said VPN tunnel is established over said modem," such
as is claimed by Applicant.

Therefore, *Genty et al.* does not teach each and every
element as set forth in claim 11 as required by M.P.E.P. section
2131. Thus, Applicant respectfully submits that claim 11 is not
anticipated by *Genty et al.*

Applicants also respectfully submit that claims 13-20
and 22-23 are not anticipated by *Genty et al.* for all the same
reasons as stated above with reference to claims 1-10 and 11-12.

35 U.S.C. '103

4. Claims 6 and 17 stand rejected under 35 U.S.C.
103(a) as being unpatentable over U.S. Publication No.
2002/0178361 (*Genty et al.*).

As stated above with reference to claims 1 and 13,
Genty et al. does not teach or suggest the limitations of claims
1 and 13. Namely, *Genty et al.* does not teach or suggest
"establishing a VPN tunnel between said at least one client
computer having said network address and said server-side system,
where said VPN tunnel is established over said modem" and
"establishing a new VPN tunnel between said different client
computer having said new network address and said new server-side
system, where said VPN tunnel is established over said modem," such
as is claimed by Applicants. Thus, claims 1 and 13 are not
rendered obvious by *Genty et al.* Therefore, claims 6 and 17 are
also not rendered obvious by *Genty et al.* at least for the
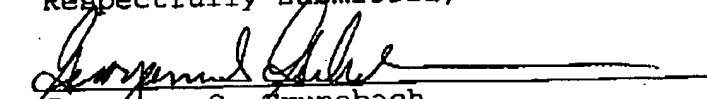
App. No. 09/940,141
Amendment A
Page 14

reasons stated above. Thus, Applicants respectfully submit the
rejection is overcome and claims 6 and 17 are in condition for
allowance.

App. No. 09/940,141
Amendment A
Page 15

C O N C L U S I O N

In view of the above, Applicants submit that the pending claims are in condition for allowance, and prompt and favorable action is earnestly solicited. Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (310) 964-4615 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,

Georgann S. Grunebach
Reg. No. 33,179

Dated: March 30, 2005

Address all correspondence to:

The DIRECTV Group,Inc.
RE/R11/A109
P. O. Box 956
El Segundo CA 90245

Telephone No. (310) 964-4615